



STATE OF WEST VIRGINIA  
DEPARTMENT OF HEALTH AND HUMAN RESOURCES  
Bureau for Public Health  
Office of Environmental Health Services

Bill J. Crouch  
Cabinet Secretary

Ayne Amjad, MD, MPH  
Commissioner & State Health Officer

**MEMORANDUM**

**TO:** Marie Prezioso, Funding Committee  
WV Infrastructure and Jobs Development Council

**FROM:** Stephanie Hickerson, P. E. *SDH*  
Water Technical Review Committee

**DATE:** April 27, 2021

**RE:** Pendleton County PSD  
IJDC Preliminary Application Number: **2021W-1947**  
Sandy Ridge Road/Moatstown Area Water Extension  
Pendleton County

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1. The Committee has reviewed the pre-application and preliminary engineering report submitted for the above referenced project in accordance with Chapter 31, Article 15-A. It has been determined that the project is:
    - a.  Consistent with the intent of the Infrastructure and Jobs Development Act and is the most cost-effective and environmentally sound alternative for solving the drinking water needs in this area.
    - b.  Consistent with the Act but may not be the most cost-effective and environmentally sound alternative for solving the drinking water needs in this area.
    - c.  Consistent with the intent of the Act and most cost-effective and environmentally sound alternative for solving the drinking water needs in this area **except** that certain issues need to be addressed prior to design and construction, as the attached comments indicate.
  
  2. Our recommendation is that:
    - a.  The Funding Committee needs to review the proposed sources of funding to determine the best mix of grant and/or loan funds in accordance with applicable guidelines.
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- b.  The Funding Committee should recommend that Council approve the proposed project and its funding plan.
- c.  The Funding Committee does not need to review the funding assumptions on this project because of deficiencies in the application. The proposed project funding should be postponed until technical comments have been resolved.
- d.  The project to be referred to the Consolidation Committee.

3. Other remarks:

### **PSC Comments**

1. Using Scenario 1, the preferred funding package consisting of a **\$500,000** IJDC District 2 Grant, and a USACE Section 571 grant of **\$1,260,000**, proposed rates of **\$54.59 for 3,400 gallons (1.78% MHI)** will provide a cash flow surplus of **\$1,608** and debt service coverage of **172.47%**.

pc: To be distributed at the Funding Committee Meeting



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**MEMORANDUM**

**TO:** Stephanie Hickerson, P.E.  
Infrastructure & Capacity Development

**FROM:** William Herold, P.E.  
Infrastructure & Capacity Development

**DATE:** April 27, 2021

**SUBJECT:** Pendleton County PSD  
IJDC Application- **2021W-1947**  
Sandy Ridge Road/Moatstown Areas Water Extension  
Pendleton County

**Recommendation:**

This preliminary application appears technically feasible and is recommended to be forwarded to the Funding Committee.

**Project Scope:**

This Preliminary Application is to extend water service to 25 new customers in the Sandy Ridge Road and Moatstown areas. The project will consist of approximately 6.3 miles (33,025 LF) of 4" and 2" water line; two (2) booster stations; one (1) 20,000 gallon water storage tank; and all necessary valves, controls, and appurtenances with water to be purchased from the Town of Franklin.

The cost per customer is **\$70,400** for the project. The total project cost is **\$1,760,000**. (USACE Section 571 Grant: **\$1,260,000** and IJDC District 2 Grant: **\$500,000**).

**Need for the Project:**

The PER indicates the Sandy Ridge Road/Moatstown areas are served by individual wells many of which experience quantity and quality problems.

**Concerns:**

1. The cost per customer of \$70,400 is high.
2. Project will add approximately 6 miles of main line and 2 pump stations and will likely require regular flushing and possibly booster chlorination in order to maintain adequate CL2 residuals.

### **Permits:**

A permit **will be** required from the WV Bureau for Public Health prior to construction.

Construction activities with a disturbed area of one (1) acre or greater are required to register for the NPDES Storm Water Construction General Permit No. WV0115924.

A permit for stream crossings may be required.

A Certificate of Convenience and Necessity will be required from the PSC.

A permit from the WV Division of Highways will be required for the construction activities that will take place within WVDOH right-of-way.

**Engineering:** 6.89% for design, 21.32% for total.

The Design Fees vs. Construction Cost for new construction is below both the average complexity curve and the very complex curve. The Design Fees vs. Construction Cost for modifications is below both the average complexity curve and the very complex curve. The Total Fees vs. Construction Cost for new construction is above both the average complexity curve and the very complex curve. The Total Fees vs. Construction Cost for modified construction is above the average complexity curve and below the very complex curve. A fee waiver will **not** be required for this project.

### **Asset Management Plan and Annual Maintenance Audit:**

The Preliminary Application indicates that there is no Asset Management Plan. That is correct, there is no Asset Management Plan on file with the Bureau for Public Health. The application indicates that the annual maintenance audit for the current year has been completed.

### **Capacity Development:**

The question about having had a capacity development assessment (CDA) within the last 5 years was marked as yes. A Capacity and Development Assessment was performed at the Pendleton County PSD-Brandywine Water System in December 2008.

Additional information that may be helpful to the IJDC in their decisions regarding approval of this project relates to the system's overall compliance. The Pendleton County PSD-Riverton (3303614) has a score of zero on the January 2021 quarter of the EPA's Compliance Tracking Tool (ETT.) The Pendleton County PSD-US 220 North (3303608) and the Pendleton County PSD- Circleville (3303609) have a score of two on the January 2021 quarter of the EPA's Compliance Tracking Tool (ETT.) The Pendleton County PSD-Brandywine (3303613) and the Pendleton County PSD-Upper Tract (3303611) have a score of three on the January 2021 quarter of the EPA's Compliance Tracking Tool (ETT.) All of these scores stem from public notice violations. The current scores are below the EPA's action level of > 11.

Based upon information from the Municipal Bond Commission, as of March 2021, Pendleton County PSD is current on their water reserve funding requirements.

Pendleton County PSD  
Project No.: **2021W-1947**  
April 27, 2021  
Page 3

**IJDC Ranking:**

- Public Health Benefit: 5
- Compliance: 0

# Public Service Commission of West Virginia

201 Brooks Street, P.O. Box 812  
Charleston, West Virginia 25323



Phone: (304) 340-0300  
Fax: (304) 340-0325

April 15, 2021

Stephanie D. Hickerson  
Office of Environmental Health Services  
Capitol and Washington Streets  
1 Davis Square, Suite 200  
Charleston, West Virginia 25301-1798

Re: Public Service Commission Staff Review Comments  
Application No. 2021W-1947  
Pendleton County PSD  
Infrastructure Preliminary Application

Dear Ms. Hickerson:

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Infrastructure application. In light of Technical Staffs comments enclosed herewith, we are recommending the application be:

forwarded to the Funding Committee

forwarded to the Consolidation Committee

returned to the Applicant

Please advise if you have any questions.

Sincerely,

01/4-itt& .41".6-VE

Jdrlathan M. Fowler, P.E.  
Engineering Division  
[JFowler@psc.state.wv.us](mailto:JFowler@psc.state.wv.us)

Enclosures  
JMF:vb

**PUBLIC SERVICE COMMISSION STAFF  
TECHNICAL REVIEW**

DATE: April 14, 2021

**PROJECT SPONSOR:** PENDLETON COUNTY PUBLIC SERVICE DISTRICT

**PROJECT SUMMARY:** Water system extension to approximately 25 customers along Sandy Ridge Road and Moatstown areas of south central Pendleton County. This project includes main water lines, a water storage tank, two booster stations and water supply provided by the Town of Franklin.

<b>PROPOSED FUNDING:</b> IJDC District 2 Grant	\$ 500,000
USACE Section 571 Grant	<u>\$1,260,000</u>
Total	<u>\$1,760,000</u>

**CURRENT RATES:** \$49.47 3,400 gallons  
\$58.20 4,000 gallons

**PROPOSED RATES:** \$54.59 3,400 gallons  
\$64.22 4,000 gallons

Application No. 2021W-1947

**RECOMMENDATION:**  forward to the Funding Committee.  
 forward to the Consolidation Committee.  
 return to the Applicant.

**FINANCIAL:** Stephen Edens

1. Current rates (\$49.47 for 3,400 gallons) are above the rate attributable to 1.25% (\$38.49) and 1.5% (\$46.19) of the Median Household Income (MHI), but below the rates attributable to 1.75% (\$53.89) and 2.0% (\$61.59) of the MHI. Increasing current rates to 1.75% and 2.0% of the MHI would provide additional revenues of \$44,833 and \$122,925 respectively.
2. Using Scenario 1, the preferred funding package consisting of a \$500,000 IJDC District 2 Grant, and a USACE Section 571 grant of \$1,260,000, proposed rates (\$54.59 for 3,400 gallons) will provide a cash flow surplus of \$1,608 and debt service coverage of 172.47%.

3. Using the Scenario 2 alternate loan package of \$1,760,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), proposed rate (\$62.04 for 3,400 gallons) will provide a cash flow deficit of \$1,042 and debt service coverage of 138.28%. An additional .19% (for a total of \$62.16 for 3,400 gallons) increase in proposed rates will be required in order to provide a cash flow surplus of \$31 and debt service coverage of 138.86%.

NOTES TO COMMENTS:

- A. Staff's detailed adjustments are listed on Attachment A for Scenario 1 (Preferred Funding Package) and Attachment B for Scenario 2 (Loan Package).
- B. The Going Level and Proforma adjustments included in the Applicant's Cash Flow Analyses for Scenarios 1 and 2 were used in Staff's Cash Flow Analyses, except as noted on Attachments A and B.
- C. The Applicant did include a Maximum Rate Cash Flow Analysis with the application, using proposed rates of \$62.04 for 3,400 gallons. Staff used this data as its basis of analysis for Scenario 2.
- D. Staff notes that the Accountant's Preliminary Application (page 3) shows going level rate of \$54.59 for 3,400 gallons while (page 4) shows preferred rate of \$49.47 for 3,400 gallons, which is the District's current rates approved in Case No. 19-0296-PWD-19A. However, the District's proposed going level rate of \$54.59 for 3,400 gallons is not in effect as of this date. The District filed Case No. 21-0237-PWD-19A on March 4, 2021, requesting a rate increase. The case is still active.
- E. Senate Bill 234, effective June 12, 2015, required water and sewer utilities that are political subdivisions of the state to maintain a cash working capital reserve in an amount of no less than one-eighth (1/8) of actual annual operation and maintenance expenses. It should be noted that the cash flows provided by the project sponsor include funding for the 1/8 cash working capital reserve. Staff accepted that amount in its analyses. However, this amount may be reviewed by the Commission in future filings in accordance with Public Service Commission General Order 183.11.
- F. More detailed justification including a Rule 42 exhibit will be required when filing for a Certificate of Convenience and Necessity.



ENGINEERING: Mansour Mashayekhi

This project will require a Certificate of Convenience and Necessity from the PSC. The project sponsor should reference this application number on the PSC's Form No. 4 when its application is filed at the Commission given the requirement of West Virginia Code §24-2-11 (c) and (e) *et seq.*

*Scope:* The proposed project will consist of installing new four and two inch water lines to provide public drinking water to 25 customers, with capacity to accommodate future new customers. A new four inch main will tie into the Town of Franklin water system, which will provide water to the District in accordance with the two parties' water purchase agreement. The estimated cost of the project is \$1,760,000.

*Need for Project: Health, sanitation and security:* These scattered remote areas generally have lower household incomes and suffer from erratic water supply, including dry wells during the summer months and having wells with poor quality of water. *Aging Infrastructure:* the District's system is in decent condition, and this project does not need to address any aging infrastructure issues and; *Reasonable Growth:* 25 new customers and a potential for up to 65 new customers within the project area.

*Customer Density:* The District will provide water service to approximately 25 new customers. The customer density for the new extensions will be approximately 4 customers per mile (25 new customers and 6.25 miles of lines).

*Cost per Customer:* Based upon the estimated project cost of \$1,760,000, and having approximately 25 new customers, the cost per new customer will be approximately \$70,400. Which is considered to be relatively high.

*Project Feasibility:* This project appears to be technically feasible and poses little technical risk.

*Project Alternatives:* Three alternatives were evaluated for this project: A. Buying water from town of Franklin. The District and the town of Franklin negotiated an agreement to provide water for this project. B. installing separate well which economically costly and; C. Do nothing alternative that does not address the issues at hand and does not yield a sustainable solution. Selected alternative is Alternative A — Purchasing water from the Town of Franklin due to its better economics and technical feasibility.

*Permits Required:* The project will require the following permits and approvals: WV Bureau for Public Health, General NPDES Permit for storm water control, WV Division of Highways occupation permits, Public Lands (PL) stream crossing permit, and US Corps of Engineers permit.

*Consolidation:* There are no consolidation issues with the selected alternative.

*Inconsistencies:* None was noticed for this project.

*Operation and Maintenance (O&M) Expenses:* This project will add approximately 25 new customers and the project's O&M costs will be approximately \$8,000/year.

*Engineering Agreement:* The applicant has provided documentation relative to compliance with West Virginia Code §5G-1-1, et seq. Based on the filing, the total design fees for engineering are \$85,000 at construction cost of \$1,233,416. This is approximately 6.89% of the construction cost.

<i>Preliminary Project Ranking</i>		
<i>O &amp; M Capabilities</i>		
Performance Measures:	1	<i>Pt.</i>
Asset Management:	0	<i>Pt.</i>
Environmental Management:	0	<i>Pt.</i>
Readiness to Proceed:	0	<i>Pt.</i>
Cost Effectiveness:	0	<i>Pt.</i>
Compliance with PSC Orders:	0	<i>Pt.</i>

PENDLETON COUNTY PSD  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2020  
 APPLICATION NO: 2021W-1947  
 April 14, 2021

**PREFERRED FUNDING PACKAGE  
 SCENARIO 1**

	Cash Flow Going Level Per Application Before Project	Cash Flow Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
<b>AVAILABLE CASH</b>				
Operating Revenues	501,745	508,727	(45,469) (1)	463,258
Other Operating Revenue	12,969	12,969		12,969
SB 234 Annual Working Cash Collections			45,469 (2)	45,469
Interest Income & Other Misc.	1,255	1,255		1,255
<b>Total Cash Available</b>	<b>515,969</b>	<b>522,951</b>		<b>522,951</b>
<b>OPERATING DEDUCTIONS</b>				
Operating Expenses	355,833	363,750		363,750
Taxes	11,501	11,501		11,501
<b>Total Cash Requirements Before Debt Service</b>	<b>367,334</b>	<b>375,251</b>		<b>375,251</b>
Cash Available for Debt Service (A)	148,635	147,700		147,700
<b>DEBT SERVICE REQUIREMENTS</b>				
Principal & Interest (B)	85,638	85,638		85,638
Other Debt				
Reserve Account @ 10%	3,080	3,080		3,080
Renewal & Replacement Fund (2.5%)	12,899	13,074	(1,168) (3)	11,906
<b>Total Debt Service Requirement</b>	<b>101,617</b>	<b>101,792</b>	<b>(1,168)</b>	<b>100,624</b>
SB 234 Cash Working Capital	44,479	45,469		45,469
<b>Remaining Cash</b>	<b>2,539</b>	<b>439</b>	<b>1,168</b>	<b>1,608</b>
Percent Coverage (A) / (B)	173.56%	172.47%		172.47%
Average rate for 3,400 gallons	\$ 54.59 *	\$ 54.59	\$	54.59
Average rate for 4,000 gallons	\$ 64.22 *	\$ 64.22	\$	64.22

\* District's Proposed Going-Level Rate. Not approved.

**PENDLETON COUNTY PSD  
CASH FLOW ANALYSIS  
YEAR ENDED: June 30, 2020  
APPLICATION NO: 2021W-1947**

**Attachment A  
PREFERRED FUNDING PACKAGE  
SCENARIO 1**

Staff Adjustments

Adjustment Description			Increase <Decrease>
(1) Operating Revenues	<b>Per Staff Analysis</b>	<b>463,258</b>	<b>(45,469)</b>
	<b>Per Application with Project</b>	<b>508,727</b>	
Adjust revenues in accordance with PSC General Order 183.11.			
(2) SB 234 Annual Working Cash Collections	<b>Per Staff Analysis</b>	<b>45,469</b>	<b>45,469</b>
	<b>Per Application with Project</b>		
Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3) Renewal & Replacement Fund (2.5%)	<b>Per Staff Analysis</b>	<b>11,906</b>	<b>(1,168)</b>
	<b>Per Application with Project</b>	<b>13,074</b>	

Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.

PENDLETON COUNTY PSD  
 CASH FLOW ANALYSIS YEAR  
 ENDED: June 30, 2020  
 APPLICATION NO: 2021W-1947  
 April 14, 2021

**LOAN PACKAGE  
 SCENARIO 2**

	Max Rate Going Level Per Application Before Project	Max Rate Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
	1	2	3		4
<b>AVAILABLE CASH</b>					
Operating Revenues	501,745	623,727	(44,369)	(1)	579,358
Other Operating Revenue	12,969	12,969			12,969
SB 234 Annual Working Cash Collections			45,469	(2)	45,469
Interest Income & Other Misc.	1,255	1,255			1,255
<b>Total Cash Available</b>	<b>515,969</b>	<b>637,951</b>	<b>1,100</b>		<b>639,051</b>
<b>OPERATING DEDUCTIONS</b>					
Operating Expenses	355,833	363,750			363,750
Taxes	11,501	11,501			11,501
<b>Total Cash Requirements Before Debt Service</b>	<b>367,334</b>	<b>375,251</b>			<b>375,251</b>
Cash Available for Debt Service (A)	148,635	262,700	1,100		263,800
<b>DEBT SERVICE REQUIREMENTS</b>					
Principal & Interest (B)	85,638	187,478	2,500	(3)	189,978
Other Debt					
Reserve Account @ 10%	3,080	13,264	250	(4)	13,514
Renewal & Replacement Fund (2.5%)	12,899	15,949	(1,141)	(5)	14,808
<b>Total Debt Service Requirement</b>	<b>101,617</b>	<b>216,691</b>	<b>1,609</b>		<b>218,300</b>
SB 234 Cash Working Capital	44,479	45,469			45,469
<b>Remaining Cash</b>	<b>2,539</b>	<b>540</b>	<b>(509)</b>		<b>31</b>
Percent Coverage (A) / (B)	173.56%	140.12%			138.86%
Average rate for 3,400 gallons	54.59 * \$	62.04 \$	0.12		62.16
Average rate for 4,000 gallons	64.22 * \$	72.98 \$	0.15		73.13

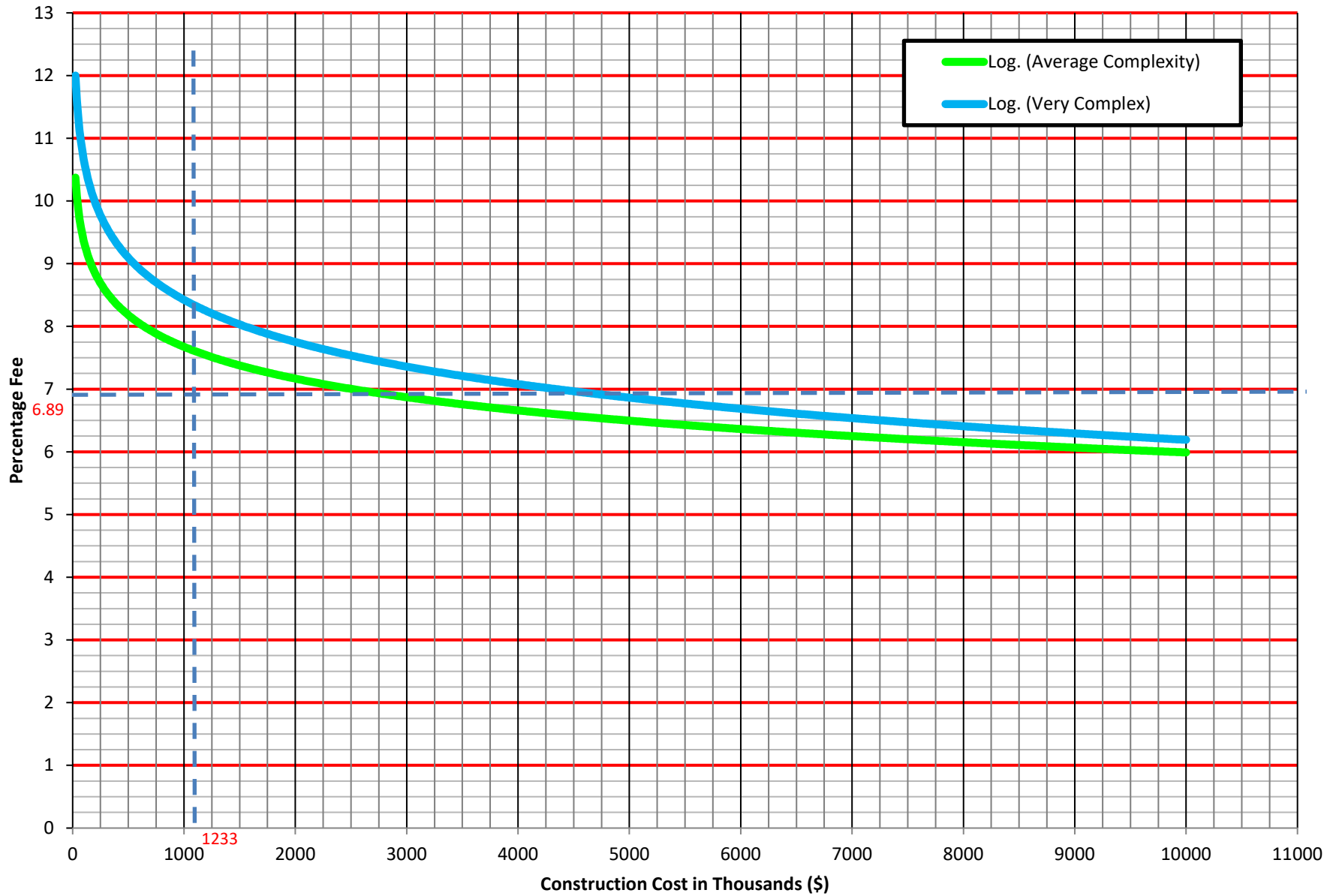
\* District's Proposed Going-Level Rate. Not approved.

Staff Adjustments

Adjustment Description			Increase <Decrease>	
(1)	Operating Revenues	Per Staff Analysis	579,358 623,727	(44,369)
	Adjust revenues in accordance with PSC General Order 183.11 and Staff projected that an additional \$1,100 in revenues would be needed to achieve 115% debt coverage and a positive cash balance.			
(2)	SB 234 Annual Working Cash Collections	Per Staff Analysis Per Application with Project	45,469	45,469
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	Principal & Interest	Per Staff Analysis Per Application with Project	189,978 187,478	2,500
	The difference in P&I is related to Staffs calculation of a loan of \$1,760,000 for 40 years (paid back over 38 years) at 5%.			
(4)	Reserve Account @ 10%	Per Staff Analysis Per Application with Project	13,514 13,264	250
	Staff assumed a 10% reserve on the new debt.			
(5)	Renewal & Replacement Fund (2.5%)	Per Staff Analysis Per Application with Project	14,808 15,949	(1,141)
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

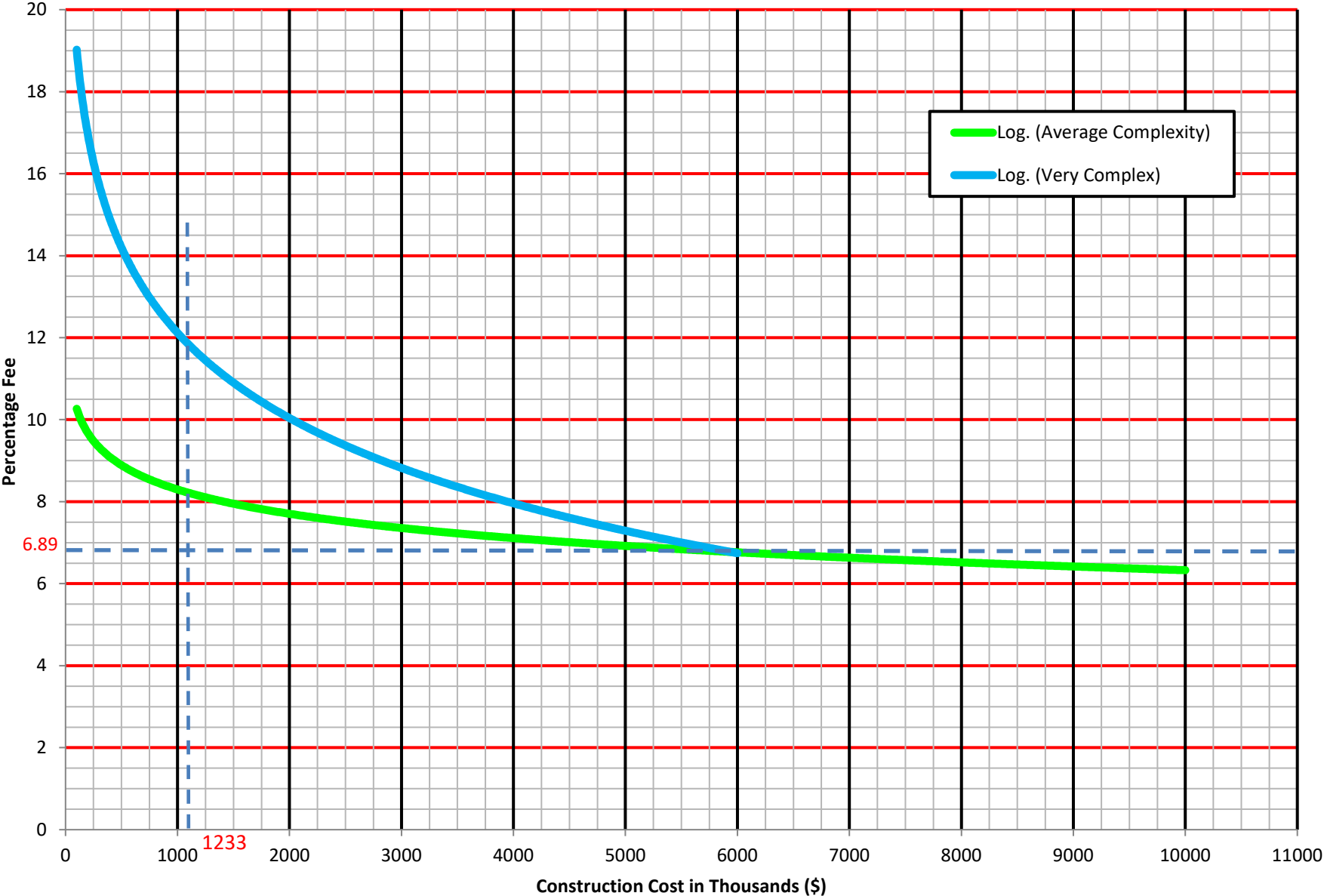
**Graph 1. Design Fee vs. Construction Cost for New Construction**

Pendleton Co PSD  
2021W-1947



# Graph 2. Design Fee vs. Construction Costs for Modifications

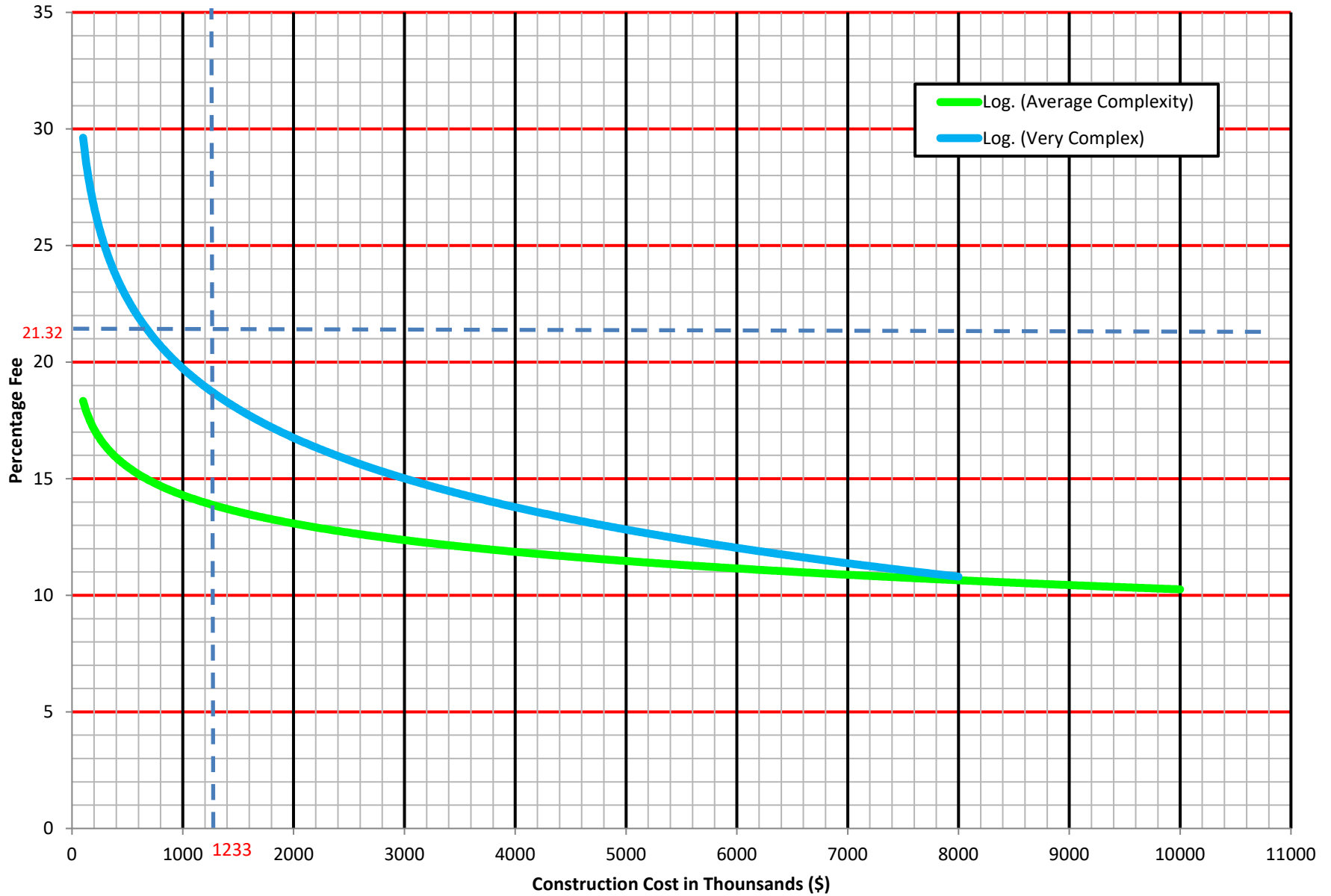
Pendleton Co PSD  
2021W-1947





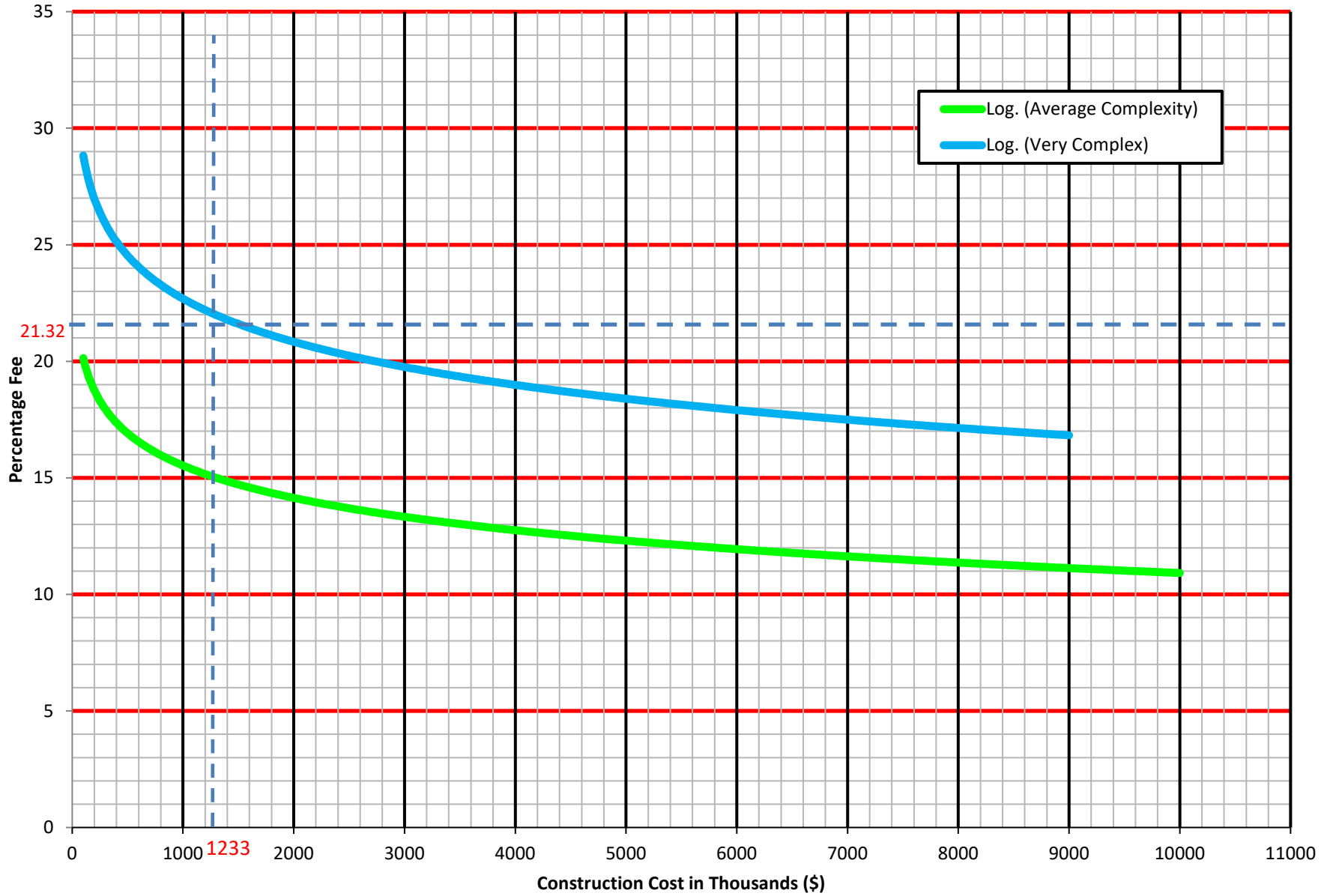
**Graph 3. Total Fee vs. Construction Cost for New Construction**

Pendleton Co PSD  
2021W-1947



**Graph 4. Total Fee vs. Construction Cost for Modifications**

Pendleton Co PSD  
2021W-1947





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west virginia department of environmental protection

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Division of Water and Waste Management  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304-2345  
Telephone: 304-926-0495  
Fax: 304-926-0496

Harold D. Ward, Cabinet Secretary  
www.dep.wv.gov

**MEMORANDUM**

**MEMO TO:** Stephanie D Hickerson, P. E.  
Office of Environmental Health Services  
Bureau for Public Health

**FROM:** John M. Perkins *gmf*  
Supervisor  
General Permits & Support Team

**DATE:** March 17, 2021

**SUBJECT:** Infrastructure Preliminary Application for the Pendleton Co PSD (2021W-1947):  
Sandy Ridge Rd. Ext. in Pendleton County, WV.

We have reviewed the above referenced project application information. The Pendleton Co PSD purchases water from the Town of Franklin. No NPDES permit modifications are necessary.

If the Pendleton Co. PSD is considering repairing and painting an existing water treatment plant or storage tanks, then the scope of this project requires precautions to prevent contamination of the waters of the state. Prior to beginning any removal of old paint, the Pendleton Co. PSD should contact Mr. Jeremy Bandy or a member of his staff at (304)-926-0499, extension 43894 for guidance in determining whether the paint to be removed is considered a hazardous waste. If so, proper containment and disposal procedures must be followed for the paint and any material associated with the sand blasting. If it is determined that the paint is not hazardous, the Pendleton Co. PSD should contact Yogesh Patel or a member of his staff at (304)-926-0499, extension 43877 for proper disposal options.

Construction activities with a disturbed area of one (1) acre or greater are now required to register for the NPDES Storm Water Construction General Permit No. WV0115924 that became effective on March 9, 2019. Projects registered under the previous General Permit No. WV0115100 were automatically provided coverage under WV/NPDES General Permit No. WV0115924. For more information, they may contact Larry Board at (304)-926-0499, extension 43883.

In light of the above, we have no objection to this project as long as the appropriate provisions are taken to assure compliance with Chapter 22, Article 11, of the Code of West Virginia and any associated regulations. The responsible party may contact Mylinda Maddox (304) 926-0499 ext. 43825, should additional information be required.

JMP:mam

cc: Katheryn Emery



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west virginia department of environmental protection

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Office of Abandoned Mine Lands & Reclamation  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

Harold D. Ward, Cabinet Secretary  
dep.wv.gov

## MEMORANDUM

**To:** Stephanie Hickerson, P.E., Manager  
Infrastructure and Capacity Development

**From:** Roger A. Earle, P.E., Waterline Coordinator *RAE*  
Office of Abandoned Mine Lands & Reclamation

**Date:** April 16, 2021

**Subject:** Pendleton County PSD – Sandy Ridge Road Extension  
IJDC Preliminary Application: 2021W-1947

This application would most likely not be eligible for AML funds because there are no known AML sites in this project area.

## OEHS District Review for Infrastructure Council Water Projects

Water System:	Pendleton Co. PSD	IJDC Number:	2021W-1947
Project Description:	Sandy Ridge Road water line extension to serve ~ 25 new customers, with potential to serve total of ~ 65	Review by:	A. Marchun
County:	Pendleton	Date:	4-9-21

<u>No.</u>	<u>Review Criteria</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Comments (Especially if No is indicated or providing a DWTRF score)</u>
1.	Does the district agree that the project scope seems to be the most feasible solution?	X			
2.	Is this the most practical project to correct the problem stated in the application?	X			
3.	Does the project solve the major operation maintenance problems in the water system?			X	
4.	Does the project eliminate deficiencies noted in the sanitary survey?			X	
5.	Should these improvements be made to this system versus another system that could serve the same area?			X	
6.	The application has an alternative in it evaluating the most likely consolidation option?			X	
7.	Do you agree with the need statement for the project?	X			
8.	Has the engineer included all justification (that you are aware of) in the project application?	X			
9.	Is the management of the water system capable of completing this project?	X			
10.	Other comments				

<u>No.</u>	<u>Review Criteria</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Comments (Especially if No is indicated or providing a DWTRF score)</u>
11.	For new projects or projects with revised scope provide DWTRF Priority Ranking Public Health Score (Indicate score in the comments section with explanation)?				
12.	For new projects or projects with revised scope provide DWTRF Priority Ranking Compliance Score (Indicate score in the comments section with explanation)?				
13.					
14.					Some of the potential new customers appear to be seasonal/recreational. Project will add over 6 miles of main line + 2 pump stations and will likely require regular flushing and possibly booster chlorination in order to maintain adequate CL2 residuals. Total Volume new pipe ~ 20,500 gallons; 25 customers x 150 GPD/customer, 3750 GPD estimated usage. Detention: 20,500 Gal/3750 GPD ~ 5.5 days (Note: PER quoted 79 GPD/customer average usage for the PSD; utilizing this figure, the estimated detention increases to ~ 10.4 days)



STATE OF WEST VIRGINIA  
**DEPARTMENT OF HEALTH AND HUMAN RESOURCES**  
Bureau for Public Health  
Office of Environmental Health Service

Bill J. Crouch  
Cabinet Secretary

Ayne Amjad, MD, MPH  
Commissioner & State Health Officer

**MEMORANDUM**

**TO:** Stephanie Hickerson, P.E., Manager  
Infrastructure and Capacity Development Unit

**FROM:** Valerie A. Plance, ERS III  
Capacity Development Program

**DATE:** April 7, 2021

**RE:** Pendleton County PSD (PWSID#s 3303611, 3303613, 3303608, 3303609,  
3303614)  
IJDC Application No.: 2021W-1947  
Pendleton County

The Pendleton County PSD preliminary infrastructure application indicates that they are not seeking DWTRF monies. The system indicates in the application that they do not have an asset management plan. There is no approved asset management plan on file with the BPH.

The question about having had a capacity development assessment (CDA) within the last 5 years was marked as yes. A CDA was performed at the Pendleton County PSD-Brandywine in December 2008.

Additional information that may be helpful to the IJDC in their decisions regarding approval of this project relates to the system's overall compliance. The Pendleton County PSD-Riverton (3303614) has a score of zero on the January 2021 quarter of the EPA's Compliance Tracking Tool (ETT.) The Pendleton County PSD-US 220 North (3303608) and the Pendleton County PSD- Circleville (3303609) have a score of two on the January 2021 quarter of the EPA's Compliance Tracking Tool (ETT.) The Pendleton County PSD-Brandywine (3303613) and the Pendleton County PSD-Upper Tract (3303611) have a score of three on the January 2021 quarter of the EPA's Compliance Tracking Tool (ETT.) All of these scores stem from public notice violations. The current scores are below the EPA's action level of > 11.

Based upon information from the Municipal Bond Commission, as of March 2021, Pendleton County PSD is current on their water reserve funding requirements.

If you require further information from the capacity development program, please contact me.

VAP